

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a  
SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON  
CORPORATION, JOHN DOES 1 through 5,  
and JANE DOES 1 through 5,  
Defendants.

Civil Action  
No. 04-10535-PBS

**PLAINTIFF SHAREHOLDER.COM'S MOTION FOR LEAVE TO AMEND THE  
COMPLAINT**

Shareholder.com moves pursuant to Fed. R. Civ. P. 15 for leave to amend its First Amended Complaint (the "Complaint"). At the time it filed the Complaint, Shareholder did not know which CCBN.com employees were responsible for the intrusions into its internal computer systems and, therefore, Shareholder.com's Complaint included several John Does as defendants. During discovery, Shareholder.com has learned that Robert I. Adler, the President and co-founder of CCBN.com, is responsible for some number of unauthorized intrusions into Shareholder.com's internal computer systems.

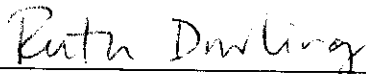
Shareholder.com seeks leave to amend the Complaint to substitute Mr. Adler as one of the John Doe defendants and to allege sufficient facts to proceed against Robert Adler. In addition, Shareholder.com seeks to modify paragraph 11 of the Complaint.

Shareholder.com's discovery of Mr. Adler's involvement occurred only recently.

Amendment will not prejudice the defendants in any way given that Mr. Adler's deposition has not yet been taken and there is plenty of time remaining for fact discovery.

For these reasons and those stated in the accompanying memorandum in support of this Motion, Shareholder.com respectfully requests that the Court allow it to file the Second Amended Complaint, attached as Tab 1 to this Motion.

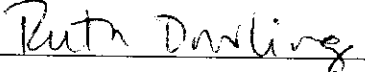
Respectfully submitted,

  
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February 15, 2005

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorney of record for each other party by hand on February 15, 2005.



LOCAL RULE 7.1 CERTIFICATE

Counsel for Shareholder.com certifies that they conferred with defendants' counsel and were unable to narrow or resolve the issues presented in this motion.

